

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division

_____	x	
LUKE WILSON,	:	
	:	
Plaintiff,	:	Case No. 21-CV-55 (TTC)
	:	
-against-	:	
	:	
THE TOWN OF MOUNT JACKSON, CHIEF :		
OF POLICE JEFF STERNER, SERGEANT :		
KEITH COWART, and POLICE OFFICERS :		
CHRISTINA WHORTON, ROBERT YOUNG :		
and MARK JOHNSON of the MOUNT :		
JACKSON POLICE DEPARTMENT, and :		
TODD HOLTZMAN,	:	
	:	
Defendants,	:	
_____	x	

**MOTION FOR THE *PRO HAC VICE* ADMISSION
OF BRIAN L. BROMBERG, ESQUIRE**

I, Thomas R. Breeden, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding, hereby move the Court for the admission of Brian L. Bromberg, Esquire, *pro hac vice*, to this Court as counsel for the plaintiff for the purposes of litigating the above-captioned case and in support thereof state as follows:

1. I am seeking the admission of Brian L. Bromberg, Esq., to appear *pro hac vice* in the above-captioned case, which is pending in the U.S. District Court for the Western District of Virginia.

2. This case is not a related or consolidated matter for which Brian L. Bromberg, Esq. has previously applied to appear *pro hac vice*.

3. Residence address of Brian L. Bromberg: 352 Rutland Road #1, Brooklyn, NY 11225.

4. Office address of Brian L. Bromberg: Bromberg Law Office, P.C., 352 Rutland Road #1, Brooklyn, NY 11225.

5. Telephone number, fax number and e-mail address for Brian L. Bromberg:

Telephone: (212) 248-7906
Facsimile: (212) 248-7908
Email: brian@bromberglawoffice.com

6. Name, address, telephone number, fax number and e-mail address of local counsel:

Thomas R. Breeden, VSB No. 33410
Thomas R. Breeden, P.C.
Attorneys and Counselors At Law
10326 Lomond Drive
Manassas, Virginia 20109
Telephone: (703) 361-9277
Facsimile: (703) 337-0441
Email: trb@TBreedenlaw.com

7. Name of Party to Case: Luke Wilson

8. Name and Address of Counsel for Party:

Thomas R. Breeden, VSB No. 33410
Thomas R. Breeden, P.C.
Attorneys and Counselors At Law
10326 Lomond Drive
Manassas, Virginia 20109

9. Courts to Which Brian L. Bromberg, Esq., is Admitted and Dates of

Admission:

<u>State Bar</u>	<u>Date of Admission</u>
New York	March 4, 1992
California	July 17, 2006
New Jersey	June 19, 2017
<u>Federal Court</u>	<u>Date of Admission</u>
Southern District of New York	May 19, 1992
Eastern District of New York	June 10, 1992
Second Circuit	January 10, 2002
U.S. Supreme Court	August 4, 2003
N.D. Illinois	August 15, 2003
Seventh Circuit	May 13, 2004
Western District of New York	December 6, 2004
WDNY Bankruptcy Court	December 5, 2005
Northern District of New York	January 4, 2005
Northern District of Indiana	August 30, 2005
District of Connecticut	March 3, 2006
Northern District of California	August 7, 2006
Central District of California	August 10, 2006
Southern District of California	August 24, 2006
Eastern District of California	August 29, 2006
Western District of Wisconsin	May 14, 2008
Third Circuit	August 12, 2009
Fourth Circuit	April 11, 2011
Eleventh Circuit	August 19, 2011
Southern District of Indiana	November 16, 2015
Southern District of Texas	January 19, 2017
District of Colorado	April 20, 2017
District of New Jersey	July 6, 2017
Eastern District of Missouri	June 28, 2018
Sixth Circuit	April 15, 2019

10. Brian L. Bromberg, Esq., is an attorney in good standing and authorized to appear in the Courts identified in paragraph 9.

11. Brian L. Bromberg, Esq., is not currently disbarred or suspended in any state, territory, United States possession or tribunal.

12. Brian L. Bromberg, is not subject to any pending disciplinary proceeding by any court, agency or organization authorized to discipline him as a lawyer.

13. Brian L. Bromberg, has not been disciplined by any court, agency or organization authorized to discipline him as a lawyer.

14. Brian L. Bromberg, has never sought admission *pro hac vice* under this Rule in this District.

15. Brian L. Bromberg, consents to the jurisdiction of the courts and agencies of the Commonwealth of Virginia and the Virginia State Bar, and he further consents to service of process at any address(es) required by this Rule.

16. Brian L. Bromberg agrees to review and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice*.

17. Brian L. Bromberg, understands and agrees to comply with the rules and standards of professional conduct required of members of the Virginia State Bar.

18. A draft Order is attached hereto and incorporated herein by reference.

WHEREFORE, based upon Brian L. Bromberg's experience and credentials outlined above, it is requested that this Court grant this motion and admit Brian L.

Bromberg to assist as plaintiff's counsel in this case in association with the undersigned and his firm.

Dated: October __, 2021

Respectfully submitted,

/s/ Thomas R. Breeden
Thomas R. Breeden